

**Trout Unlimited ♦ Environmental Defense Fund ♦ American Rivers ♦ The Nature Conservancy
♦ Point Blue Conservation Science ♦ Sacramento River Preservation Trust ♦ River Partners ♦
Friends of the River ♦ Institute for Ecological Health ♦ California Trout ♦ Audubon California ♦
California Waterfowl Association**

September 14, 2015

FESSRO Floodway Ecosystem Sustainability Branch
P. O. Box 942836
Sacramento, CA 94236-0001
Attention: Stacy Cepello

Re: *Central Valley Flood System Conservation Strategy*.

Dear Mr. Cepello and FESSRO staff,

Thank you for the opportunity to provide comments on the draft *Central Valley Flood System Conservation Strategy* (Strategy). Our organizations congratulate the Department of Water Resources (DWR) for completing this draft strategy, which articulates a progressive vision for supporting the health of California's rivers and dependent fish and wildlife populations while improving the safety and reliability of the state's flood system through the implementation of multiple-benefit flood projects. We commend you for this effort and fully support the finalization of this document to help achieve the goal of integrated flood management in the Central Valley.

Over the years, our groups have strongly engaged in the public process to help develop the Central Valley Flood Protection Plan (CVFPP) and have emphasized two elements necessary for the Strategy to include in order for the CVFPP to achieve its legislated purpose and be successful. The first element we have championed was that the Strategy must include measurable objectives to enable setting regional and system-wide goals and measure progress over time. The second element was the Strategy must promote ecosystem recovery by looking beyond mitigation (actions that offset negative impacts of projects) to ecological uplift (actions that contribute to the recovery and stability of native species populations, biological diversity, and ecological function). We are pleased to see that the draft Strategy seeks to address both of these elements. With these elements, the Strategy sets the stage for implementing multiple-benefit flood projects that will improve ecological function to help sustain wildlife and human communities through more extreme floods and droughts that are predicted as a consequence of climate change.

Having reviewed the draft, we offer the following comments to help improve and advance the Strategy. Please note that we have tried to keep these comments concise and fairly high level. Some of the signatories to this letter may therefore provide additional, more specific comments in these and related areas.

Provide guidance for using the objectives. The core strategy of the Conservation Strategy should be the application of Conservation Objectives to the CVFPP at both the regional scale, as presented in the regional plans, and at the basin scale, as presented in the Basin Wide Feasibility Study and State Systemwide Investment Approach (SSIA). The Conservation Strategy should provide guidance related to the application of those objectives at the regional and basin scale, and quantify the extent to which Regional Plan projects advance Conservation Strategy Measurable Objectives for each given region.

Objectives based solely on the needs of special status species are not sufficient for long-term stewardship. The habitats and processes used as the basis for defining metrics and establishing conservation objectives should support a wide range of species needs and ecosystem functions beyond the immediate needs of the threatened and endangered species. The special status species habitat needs that were used to develop the objectives should be considered the minimum habitat needs required for the system design to initiate recovery of these species. We recommend the following three actions to recognize the limitation of the objectives and to develop objectives that go beyond the needs of threatened species:

- 1) The current objectives should be re-characterized as the minimum conditions necessary to initiate the recovery of threatened species.
- 2) The “opportunity” in each conservation area be relabeled as the interim objective.
- 3) The Strategy should be revised to include a set of long-term and comprehensive objectives that integrates a broader range of species needs and includes a wider range of opportunities (such as the potential for reservoir reoperation to modify flows to meet ecosystem objectives or the need to look forward to address the consequences of climate change).

Furthermore, the Conservation Strategy should acknowledge the need to review and update these objectives as new science becomes available and/or the underlying assumptions, such as reservoir operations, change. The possibility of revising the objectives is raised in the section on adaptive management (page 8-4), and the need to re-evaluate the objectives in light of new science about the function of floodplain ecosystems could be added to this section.

Define the time-frame for accomplishing the objectives. In Box 5-1, we appreciated the definition of the objectives: "This Conservation Strategy's objectives are to achieve enhancements of riverine and floodplain ecosystems (i.e., net improvements) through flood system modifications. They are specific and measurable, are intended to be attainable, are relevant to the SPFC, and include a time frame for

achievement as guidance." However, despite recognizing the importance of defining a time frame for the objectives, the time-frame for the objectives is not clear and thus will not likely support effective integration and implementation as part of the CVFPP. For example, the reference to funding on page 8-13: "Full implementation of the SSIA will take 20–25 years or more; DWR is developing a long-term financing strategy to support that effort." A financing plan is critical to implementing projects. Without a specific near-term deadline for completion, it will be almost impossible to develop a realistic financing plan for constructing projects. We suggest more clearly articulating the time frame within which the objectives are to be accomplished.

We appreciate and applaud the massive effort that has been invested in developing a Conservation Strategy that will be comprehensive and effective. We look forward to working with you to help achieve the goals of environmental stewardship in the Central Valley as they relate to flood protection by implementing multiple-benefit flood projects.

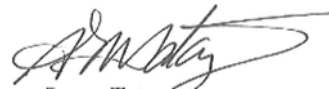
Sincerely,



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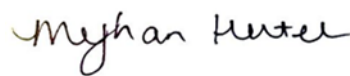
Ronald Stork
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